

Kelly Dove, Esq.  
Nevada Bar No. 10569  
Kiah D. Beverly-Graham, Esq.  
Nevada Bar No. 11916  
SNELL & WILMER LLP  
3883 Howard Hughes Pkwy, #1100  
Las Vegas, Nevada 89169  
Telephone: 702-784-5200  
Facsimile: 702-784-5252  
Email: kdove@swlaw.com  
kbeverly@swlaw.com

*Attorneys for Defendant  
Ford Motor Credit Company LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD DANIEL,  
  
Plaintiff,

vs.

WELLS FARGO HOME MORTGAGE;  
FORD MOTOR CREDIT COMPANY LLC;  
GREAT LAKES EDUCATIONAL LOAN  
SERVICES INC.; ONEMAIN FINANCIAL,  
INC.; EQUIFAX INFORMATION SERVICES  
LLC and TRANSUNION LLC,  
  
Defendants.

Case No.: 2:19-cv-00744-JCM-VCF

**~~STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND TO  
COMPLAINT TO JUNE 7, 2019~~**

**(FIRST REQUEST)**

Pursuant to Local Rule 7-1, Plaintiff Richard Daniel ("Plaintiff") and Defendant Ford Motor Credit Company LLC ("Ford" and together with Plaintiff the "Parties"), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order.

Plaintiff filed a Complaint (the "Complaint") in this Court on May 1, 2019; and

Ford was served with the Complaint on May 7, 2019.

This is the Parties' first request for an extension of time to respond to the Complaint and is not intended to cause any delay or prejudice to any party. The reason for the extension is to give Ford time to evaluate and respond to the allegations set forth in the Complaint.

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time for Ford to respond to the Complaint in this action is extended to and through June 7, 2019;

IT IS FURTHER STIPULATED AND AGREED by and between the Parties that Plaintiff will not serve discovery upon Ford until June 10, 2019, at the earliest; and

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that Ford will not object to participation in the 26(f) Conference in this action on the basis that it has not yet answered the Complaint.

Dated: May 29, 2019.

Dated: May 29, 2019.

**KNEPPER & CLARK LLC**

**SNELL & WILMER L.L.P.**

By: /s/ Shaina Plaksin  
Shaina Plaksin, Esq.  
10040 W. Cheyenne Ave.  
Suite #170-109  
Las Vegas, NV 89129  
*Attorneys for Plaintiff*  
Richard Daniel

By: /s/ Kiah D. Beverly-Graham  
Kelly Dove, Esq.  
Kiah D. Beverly-Graham, Esq.  
3883 Howard Hughes Pkwy, #1100  
Las Vegas, Nevada 89169  
*Attorneys for Defendant Ford Motor Credit Company LLC*

**ORDER**

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

DATED: May 29, 2019